

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TRISTAN LOGAN,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF LABOR,
PENSION AND WELFARE BENEFITS
ADMINISTRATION.

Defendants.

JOINT MOTION FOR AN EXTENSION OF TIME TO COMPLETE DISCOVERY
AND TO FILE DISPOSTIVE MOTIONS DUE TO
A DEATH IN THE PLAINTIFF'S FAMILY

The United States Department of Labor, Pension and Welfare Benefits Administration and the plaintiff, Tristan Logan (the "parties"), herein move this Court for an Extension of Time to Complete Discovery and to File Dispositive Motions due to a Family Emergency Suffered by the Plaintiff. The parties are seeking an extension to June 20, 2008, due to a death in the plaintiff's immediate family. As grounds for this Motion the parties state as follows:

1. On Friday, April 4, 2008 the defendant was informed that the plaintiff's foster son was killed in a car accident in Florida;
2. The plaintiff and his family are making funeral arrangements and plans to be in Florida to settle the son's affairs;
3. The plaintiff is extremely distraught and is not in the

proper frame of mind to finalize some discovery issues;
and

4. The defendant is currently working on filing a dispositive motion and requires the additional time so that the plaintiff can respond to an outstanding discovery issue.

WHEREFORE, based on a death in the plaintiff's immediate family, the parties herein jointly move this Court for an extension of time to June 15, 2008 to complete discovery and for the defendant to file his Motion for Summary Judgment.

Respectfully submitted,

TRISTAN LOGAN,

JOHN E. POTTER,
POSTMASTER GENERAL,
UNITED STATES POSTAL SERVICE,

By his Attorneys,

MICHAEL J. SULLIVAN
United States Attorney

/s/ by Rayford A. Farquhar
Tristan Logan,
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/s/ Rayford A. Farquhar
Rayford A. Farquhar
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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 7, 2008.

/s/ Rayford A. Farquhar
Rayford A. Farquhar

LOCAL RULE 7.1 CERTIFICATION

I, Rayford A. Farquhar, Assistant United States Attorney, do hereby state that on April 4, 2008 I spoke with Tristan Logan and he assented to the filing of this Joint Motion for an Extension of Time to Complete Discovery and to file Dispositive Motions.

/s/ Rayford A. Farquhar

Rayford A. Farquhar
Assistant U.S. Attorney

Dated: April 7, 2008